

MEMO ENDORSED

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September 17, 2020

VIA ELECTRONIC CASE FILING

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Hecht v. Precious Moments Company, Inc.*
Case No. 1:20-cv-05752
Letter Motion - Joint Request for 60-day Stay of Proceedings

Your Honor:

Plaintiff Irene Hecht and Defendant Precious Moments Company, Inc. respectfully request a 60-day stay of all proceedings pending settlement, in support of which the parties state as follows:

1. The current date on which Defendant is to respond to Plaintiff's Complaint is September 18, 2020, which was extended for on thirty day period from August 19, 2020, by way of the Court's August 19, 2020 Order [Dkt. #8] granting Defendant's August 18, 2020 consent motion [Dkt. #6].
2. An Initial Pretrial Conference is set for October 21, 2020 [See Dkt. #7].
3. The parties have reached settlement terms approved by counsel for both sides and set forth in a draft settlement agreement that is under final review by the principals.

Accordingly, judicial economy militates heavily in favor of entry of an Order:

1. Staying all proceedings up to and including November 17, 2020;
2. Vacating the current Complaint response date of August 19, 2020 and the Initial Pretrial Conference date of October 21, 2020;
3. Requiring that on or before November 10, 2020, the parties dismiss the case or request a reset Initial Pretrial Conference date.

Respectfully submitted this 17th day of September, 2020,

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Application GRANTED. All deadlines in this matter are extended until **November 17, 2020**. The conference scheduled for October 21, 2020 is hereby ADJOURNED *sine die*. The parties are ORDERED to file a joint status update on or before **November 10, 2020**, notifying the Court whether they have reached a final settlement or instead intend to resume pretrial proceedings.

Dated: September 17, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE